

Department of Energy

Idaho Operations Office 1955 Fremont Avenue Idaho Falls, ID 83401

December 19,2003

Richard I. Loos, Project Director Clean/Close INTEC Idaho Completion Project P.O. Box 1625 2525 North Fremont Ave. Idaho Falls, **10** 83415

SUBJECT: Engineering Evaluation/Cost Analysis for Deactivation & CPP-603 Fuel Storage

Basins = (EM-ER-03-318)

REFERENCE: R.L. Loos to F.C. Holmes, November 24,2003, (CCN 46385)

Dear Mr. Loos:

DOE has made minor changes to the wording of the Memorandum submitted by the above referenced letter. Your **staff** has agreed to the changes and **the** signed Memorandum is provided with this letter.

The above referenced letter (CCN 46385) seemed to misinterpretthe process for approving a Non-time Critical Removal Action. DOE has, by signing the enclosed Memorandum, given permission for BBWI tu develop an Engineering Evaluation/Cost Analysis (EE/CA) for the Deactivation of the CPP-603 Fuel Storage Basins. The EE/CA will compare alternative methods of performing the proposed action.

The EE/CA will be reviewed by DOE and be subject to public comment. Since this will be the first visible use of Non-time Critical Removal Action authority for D&D at the INEEL and the waste generated by the removal is assumed, at this time, to be disposed in the ICDF, a public meeting on the EE/CA is prudent. Public comments on the ICDF indicated a concern with the disposal of D&D debris. After consideration of public comment on the EE/CA, DOE will prepare an Action Memorandum that will select the action to implement deactivation of CPP-603.

At this time, it is assumed that a **Non-time** Critical Removal Action is appropriate but only when the Action Memorandum is signed, will **DOE** be giving approval for the action. **No** waste generated by pre-Action Memorandum activities can be placed in the ICDF. Such waste does not meet the Waste Acceptance Criteria of being generated by a CERCLA action.

Frank C. Holmes, Director INTEC Programs Division

Enclosure